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Attorneys for Plaintiffs
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MountainView Hospital; and Southern Hills
Medical Center, LLC d/b/a Southern Hills
Hospital & Medical Center

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SUNRISE MOUNTAINVIEW HOSPITAL, INC.
D/B/A MOUNTAINVIEW HOSPITAL; and
SOUTHERN HILLS MEDICAL CENTER, LLC
D/B/A SOUTHERN HILLS HOSPITAL &
MEDICAL CENTER,

Plaintiffs,

vs.

BLUE CROSS BLUE SHIELD HEALTHCARE
PLAN OF GEORGIA, INC.,

Defendant.

Case No.: 2:23-cv-00992-MMD-BNW

**PLAINTIFFS SUNRISE
MOUNTAINVIEW HOSPITAL, INC. AND
SOUTHERN HILLS MEDICAL CENTER,
LLC’S UNOPPOSED MOTION FOR
EXTENSION OF TIME**

(FIRST REQUEST)

Pursuant to LR IA 6-1 and 6-2, Plaintiffs, Sunrise MountainView Hospital, Inc. d/b/a MountainView Hospital (“MountainView Hospital”), and Southern Hills Medical Center, LLC d/b/a Southern Hills Hospital & Medical Center (“Southern Hills Hospital”), (collectively “Plaintiffs”), by and through their counsel, Bailey ♦ Kennedy, respectfully move this Court for an extension of time to and including Friday, September 15, 2023, to file their Response to

1 Defendant Blue Cross Blue Shield Healthcare Plan of Georgia, Inc.’s (“Defendant”) Motion to
2 Dismiss Plaintiffs’ Complaint. In support of this request, Plaintiffs offer the following:

3 On August 23, 2023, Defendant filed its Motion to Dismiss [Dkt. No. 17]. Pursuant to
4 Local Rule 7-2(b), Plaintiffs’ response is currently due on September 6, 2023.

5 Due to the time associated with drafting a response to Defendant’s Motion to Dismiss
6 and reviewing the voluminous documents that Defendant attached to such motion, and due to
7 the schedule of Plaintiffs’ counsel, Plaintiffs need additional time to prepare their response.

8 Plaintiffs therefore respectfully request an extension of time to and including Friday,
9 September 15, 2023, to file their Response to Defendant’s Motion to Dismiss. This is the first
10 motion to extend time to respond to the Motion to Dismiss Plaintiffs’ Complaint.

11 Plaintiffs’ request is made in good faith and no party will be prejudiced by the granting
12 of this Motion. Indeed, counsel for Defendant has advised that Defendant does not oppose the
13 relief requested herein.

14 Additionally, the granting of this Motion will not delay the proceeding as the parties
15 are still actively engaged in drafting discovery requests and moving this case forward.

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1 Consequently, Plaintiffs respectfully suggest that their request for an extension of time
2 to and including Friday, September 15, 2023, to file its Response to Defendant's Motion to
3 Dismiss [Dkt. No. 17, filed August 23, 2023], should be granted.

4 DATED this 30th day of August, 2023.

5 BAILEY ♦ KENNEDY

6 By: /s/ Joshua M. Dickey
7 JOSHUA M. DICKEY

8 In Association With:

9 ADAM CHILTON
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11 Dallas, Texas 75201

12 *Attorneys for Plaintiffs*
13 *Sunrise MountainView Hospital, Inc.*
14 *d/b/a MountainView Hospital; and*
Southern Hills Medical Center, LLC
15 *d/b/a Southern Hills Hospital &*
16 *Medical Center*

17 **IT IS SO ORDERED:**

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19 UNITED STATES DISTRICT COURT JUDGE

20 DATED: August 30, 2023

CERTIFICATE OF SERVICE

I certify that I am an employee of BAILEY ❖ KENNEDY and that on the 30th day of August, 2023, service of the foregoing **PLAINTIFFS SUNRISE MOUNTAINVIEW HOSPITAL, INC. AND SOUTHERN HILLS MEDICAL CENTER, LLC'S UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** was made by mandatory electronic service through the United States District Court's electronic filing system and/or by depositing a true and correct copy in the U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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